

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Jiankuan Luo

Plaintiff,

Case No.: 1:26-cv-09681

v.

The Partnerships and Unincorporated
Associations Identified on Schedule A,

Defendants.

COMPLAINT

Plaintiff Jiankuan Luo (“Plaintiff”), by and through undersigned counsel, brings this action against the Partnerships and Unincorporated Associations identified on Schedule A (collectively, “Defendants”) and alleges as follows:

NATURE OF THE ACTION

1. Plaintiff owns U.S. Trademark Registration No. 8,304,074 for the mark samiyoe (the “Plaintiff Mark”) for use in connection with earbuds. A copy of the registration record is attached as Exhibit 1.
2. Defendants operate fully interactive online stores identified on Schedule A (the “Defendant Online Stores”). Through those stores, Defendants use the Plaintiff Mark to advertise, offer for sale, and sell non-genuine earbuds (the “Counterfeit Products”) without Plaintiff’s authorization.
3. Plaintiff, through its representative, completed a test purchase from each Defendant Online Store for delivery to an address in this Judicial District. Each Defendant accepted payment and processed the order for shipment to Illinois.
4. Defendants’ use of the Plaintiff Mark on non-genuine goods is likely to

Plaintiff's ownership and the validity of the Plaintiff Mark, whether Defendants' uses constitute trademark infringement, counterfeiting, and false designation of origin, whether those uses are likely to cause consumer confusion, and the appropriate relief. Joinder is therefore proper under Federal Rule of Civil Procedure 20(a)(2) and promotes the efficient resolution of these related claims.

PLAINTIFF, THE PLAINTIFF MARK, AND PLAINTIFF'S PRODUCTS

16. Plaintiff has used the Plaintiff Mark in U.S. commerce in connection with Plaintiff Products since at least 2025.

17. The Plaintiff Mark is registered on the Principal Register. The registration is valid, subsisting, and in full force and effect and constitutes *prima facie* evidence of the mark's validity, Plaintiff's ownership, and Plaintiff's exclusive right to use the mark in commerce for the registered goods. See 15 U.S.C. § 1057(b).

18. The federal registration provides constructive notice of Plaintiff's ownership of the Plaintiff Mark. See 15 U.S.C. § 1072.

19. Plaintiff has invested substantial time, money, and effort in developing, marketing, promoting, and protecting the Plaintiff Products, the Plaintiff Mark, and the goodwill associated with them.

20. As a result of Plaintiff's use, sales, and promotional efforts, consumers have come to associate the Plaintiff Mark with Plaintiff and Plaintiff Products. The Plaintiff Mark and its associated goodwill constitute valuable commercial assets of Plaintiff.

21. Plaintiff has not licensed, authorized, or consented to Defendants' use of the Plaintiff Mark or to Defendants' manufacture, importation, advertising, offering for sale, or sale of the Counterfeit Products.